

December 10, 2018

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Docket 18-336
Implementation of the National Suicide Hotline Improvement Act of 2018

Dear Commissioners:

Arizona Health Care Cost Containment System (AHCCCS), the state's Medicaid agency serving 1.9 million Arizonans and invested in public mental health and the prevention of suicide in our country, is writing to urge you to designate a 3-digit code as a Behavioral Health and Suicide Crisis Lifeline.

The time is now to embrace mental and emotional wellness as a national priority and to deliver national 3-digit access to crisis intervention services. [Suicide death](#) and related human suffering including substance use disorder and mental illness are at record highs in the US. Despite many valuable efforts, our resources cannot meet this level of need. In this environment and at this crucial juncture, we urgently need to expand upon the nation's greatest resource for support and self-help to prevent suicide death.

The National Suicide Prevention Lifeline (the Lifeline) network of community-based call centers is uniquely valuable service that connects with millions of callers in crisis annually. As recommended by the Congressional special mandate to the Commission, the creation of the Lifeline national behavioral health and suicide N-11 number, makes this service readily accessible to the benefit of all of America's communities.

In 2004, the Substance Abuse and Mental Health Services Administration launched the National Suicide Prevention Lifeline as an integrated national effort to reach people in crisis, using the single number 1-800-273-8255 as a uniform access point to connect to crisis services. The Lifeline has been a tremendous success--growing from just a few calls that first year to over 2 million last year, including more than 700,000 calls to the national Veterans Crisis Line. This, in spite of a long 1-800 number that is not easy to remember and access.

Three-digit access is a natural next step given the growth and proven effectiveness of the National Suicide Prevention Lifeline.

Three-digit access will:

- Deliver timely and effective crisis intervention services to millions of Americans
- Make it easier to connect people in need with help
- Meet the *dramatically* growing need for crisis intervention
- Help eliminate the stigma of mental health by normalizing help seeking for mental illness with the same priority we deliver for services like fire and rescue, social service referral, and telecommunication referral for people with hearing disabilities

Just last week, the Centers for Disease Control reported that more than 40,000 Americans died by suicide last year -- driving the national suicide rate to its highest rate in decades. The CDC also reported that drug overdose deaths had climbed to an all-time high -- killing over 70,000 people last year -- deaths that often represent a failure of

effective mental health intervention, as people facing untreated mental illness resort to “self-medication” through illicit drugs.

The National Suicide Prevention Lifeline saves lives every day, helping thousands of people each day find a way forward through their darkest moments. Highly trained call counselors, at the linked Veterans Crisis Line and over 160 call centers across the nation, help over 2 million Americans and their families each year cope with the challenges of mental wellness and suicidal crisis. The Lifeline network is proof positive of the power of behavioral health and suicide crisis intervention. Extensive, independent research has proven the effectiveness of crisis intervention by the highly trained counselors of the Lifeline affiliates nationwide. In 2018, Arizona achieved the second-highest rate of Lifeline calls answered in the state of origin, an important distinction that expedites crisis center handoffs to appropriate services.

A three-digit access line can help reduce the pervasive stigma associated with mental health challenges. A 3-digit access number for crisis services represents a national recognition that seeking help for behavioral health and suicidal crisis is just as much a part of life as seeking help for fire, for injury, or for other health and wellness needs. Far too many people, including men and young children have been lost to suicide as a direct result of social stigma and discrimination related to mental health struggles.

AHCCCS provides over \$100 million in crisis funding that serves all Arizonans. Part of the crisis system infrastructure is a 24x7 call center. Establishing a national framework for these important services will be critical.

Finally, the Commission has received comments suggesting that 211 Info be used for 3-digit access to crisis intervention, rather than a dedicated behavioral health and suicide lifeline. AHCCCS strongly disagrees with this suggestion and is concerned about the burden it would impose on that network, and the delay and loss of life that could occur as a result—rather than expediting access as Congress intends.


We stand at the threshold of a revolution in improved mental health and wellness services for people throughout the United States. The FCC is poised to take an important step in that revolution by designating a 3-digit Behavioral Health and Suicide Crisis Lifeline.

As a health care agency dedicated to enhancing mental health and reducing suicide, AHCCCS urges the FCC to make this designation.

We are convinced that dedicated three-digit access is a crucial opportunity to reach millions of Americans experiencing behavioral health or suicidal crisis.

Thank you very much for your engagement in this issue that affects hundreds of millions of lives in our country every year.

Sincerely,

A handwritten signature in dark ink, appearing to read "T. J. Betlach", with a stylized flourish at the end.

Thomas J. Betlach
Director